

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

)
SECURITIES AND EXCHANGE)
COMMISSION,)

Plaintiff,)

v.) Case No. 3:24-cv-05711- ZNQ-RLS

TRI-BRIDGE VENTURES, LLC) JOINT STIPULATION TO
And JOHN FRANCIS FORSYTHE, III,) DISMISS,
AND RELEASES

Defendants)

Motion Day: June 16, 2025
)
)

Plaintiff Securities and Exchange Commission (the “Commission” or the “SEC”) and Defendants John Francis Forsythe, III and Tri-Bridge Ventures LLC (“Tri-Bridge”) (collectively, the “Defendants”) respectfully submit this joint stipulation.

WHEREAS, the Commission filed its complaint in this civil enforcement action (the “Litigation”) on April 29, 2024.

WHEREAS, in the exercise of its discretion and as a policy matter, the Commission believes the dismissal of this case is appropriate.

WHEREAS, the Commission’s decision to seek dismissal of this Litigation does not necessarily reflect the Commission’s position on any other case.

WHEREAS, by this stipulation, the Commission and the Defendants agree to have this
Litigation dismissed.

NOW, THEREFORE,

1. Pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii), the Commission and the Defendants stipulate that this Litigation be dismissed with prejudice as to the conduct alleged in the Complaint through the date of the filing of this Stipulation, and without costs or fees to either party.

2. Defendants, for themselves and any of their agents, attorneys, employees, or representatives, hereby waive and release:

- a. Any and all rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other provision of law to seek from the United States, or any agency, or any official of the United States acting in his or her official capacity, directly or indirectly, reimbursement of attorney's fees or other fees, expenses, or costs expended by Defendant[s] that in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.
- b. Any and all claims, demands, rights, and causes of action of every kind and nature, asserted or unasserted, against the Commission and its present and former officers or employees that arise from or in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.

3. Each of the undersigned represents that they have the authority to execute this stipulation on behalf of the party so indicated.

STIPULATED AND AGREED:

/s/ Pascale Guerrier
Pascale Guerrier
Securities and Exchange Commission
801 Brickell Avenue, Suite 1950
Miami, FL 33131
(305) 982-6301
GuerrierP@sec.gov

COUNSEL FOR PLAINTIFF
SECURITIES AND EXCHANGE
COMMISSION

Dated: May 22, 2025

Stanley C. Morris
Corrigan & Morris LLP
100 Wilshire Blvd., Suite 700
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310.394.2828
scm@cormorllp.com

COUNSEL FOR DEFENDANTS

Dated: May 22, 2025

1. Pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii), the Commission and the Defendants stipulate that this Litigation be dismissed with prejudice as to the conduct alleged in the Complaint through the date of the filing of this Stipulation, and without costs or fees to either party.

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- a. Any and all rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other provision of law to seek from the United States, or any agency, or any official of the United States acting in his or her official capacity, directly or indirectly, reimbursement of attorney's fees or other fees, expenses, or costs expended by Defendants that in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.
- b. Any and all claims, demands, rights, and causes of action of every kind and nature, asserted or unasserted, against the Commission and its present and former officers or employees that arise from or in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.

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COUNSEL FOR DEFENDANTS

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